

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION-DETROIT**

IN THE MATTER OF:

RAMON I. ALVAREZ
KIMBERLY D. ALVAREZ,

Debtors.

Case No. 14-49330-MBM
Honorable MARCI B. MCIVOR
Chapter 13

1817 Willard Dr.
Canton, MI 48187
XXX-XX-5912
XXX-XX-9183

**OBJECTIONS TO CONFIRMATION OF PROPOSED CHAPTER 13 PLAN
ON BEHALF OF FORD MOTOR CREDIT COMPANY LLC**

Creditor Ford Motor Credit Company LLC ("Objector") by and through counsel, KILPATRICK & ASSOCIATES, P.C., states:

1. The Debtors ("Debtor" as used herein shall include both Debtors in a joint case) filed a voluntary Chapter 13 petition on May 30, 2014.
2. On the Petition Date the Debtor was indebted to Objector in the amount of \$28,631.09 (plus interest, fees and costs) and in possession of the following: 2014 Ford F150 (VIN: 1FTFX1EF2EFB08861) (Acct. No.: 1905) (the "Vehicle").
3. The Vehicle listed in Paragraph 2 was purchased on a Retail Installment Sale Contract (the "Contract").
4. The Proposed Plan cannot be confirmed for the following reasons:
 - (a) The Proposed Plan understates the contractual monthly payment. The correct payment is \$426.06.
 - (b) The Objector is not adequately protected pursuant to 11 U.S.C. §1326 as:
 - (i) The Debtor has failed to demonstrate the Vehicle is insured pursuant to 11 U.S.C. §1326(a)

(4).

WHEREFORE, Ford Motor Credit Company LLC requests the Court to deny confirmation of the Proposed Plan, and to grant such other relief as may be appropriate and just.

Respectfully submitted,

KILPATRICK & ASSOCIATES, P.C.

By: /s/

MICHAEL P. HOGAN, ESQ. (B63074)

RYAN J. BYRD, ESQ. (P75906)

Attorneys for Creditor, Ford Motor Credit Company LLC

903 North Opdyke Road, Suite C

Auburn Hills, MI 48326

ecf@kaalaw.com

(248) 377-0700

Dated: June 10, 2014